

**IN UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

**ZT IP, LLC,**

**Plaintiff,**

**v.**

**VMWARE, INC.,**

**Defendant.**

**Case No. 3:22-cv-970**

**JURY TRIAL DEMANDED**

**DECLARATION OF RICHARD HUNG IN SUPPORT OF DEFENDANT VMWARE,  
INC.'S OPPOSITION TO WILLIAM RAMEY AND RAMEY LLP'S MOTION  
TO WITHDRAW AS COUNSEL**

I, Richard Hung, am a partner with Morrison & Foerster LLP, counsel for VMware, Inc. ("VMware"). I make this declaration in support of VMware's Opposition to William Ramey and Ramey LLP's Motion to Withdraw as Counsel.

1. Attached as **Exhibit 1** is a true and correct copy of a report generated from Lex Machina, a litigation research service provided by Lexis, showing the list of cases of 26 entities owned by or related to Carlos Gorrechategui, David Ghorbanpoor, Entente IP LLC, Pueblo Nuevo LLC, and Dynamic IP Deals, LLC (collectively, the "Business Partners") for which Mr. Ramey is counsel of record, as of October 11, 2023.

2. Attached as **Exhibit 2** are a true and correct copies of documents obtained from the Office of the Secretary of State of Texas for the following Texas entities:

- AK Meeting IP LLC (Texas Franchise Tax Public Information Report, dated February 13, 2023);

- AML IP, LLC (Texas Franchise Tax Public Information Report, dated May 15, 2023);
- AuthWallet, LLC (Texas Franchise Tax Public Information Report, dated May 15, 2023);
- Cloud Systems Holdco IP LLC (Texas Franchise Tax Public Information Report, dated May 15, 2023);
- Cybersoft IP, LLC (Texas Franchise Tax Public Information Report, dated May 16, 2022);
- DatRec, LLC (Texas Franchise Tax Public Information Report, dated May 15, 2023);
- Dynamic IP Deals LLC (Texas Franchise Tax Public Information Report, dated May 16, 2022);
- Escapex IP LLC (Certificate of Formation, dated March 24, 2022);
- Etto IP, LLC (Certificate of Formation, dated May 24, 2022);
- FerRuiz IP LLC (Certificate of Formation, dated October 19, 2022);
- GeoTag IP, LLC (Texas Franchise Tax Public Information Report, dated May 16, 2022);
- Gold IP LLC (Texas Franchise Tax Public Information Report, dated May 15, 2023);
- Haley IP LLC (Certificate of Formation, dated April 4, 2022);
- Koji IP, LLC (Certificate of Formation, dated November 8, 2022);
- mCom IP LLC (Texas Franchise Tax Public Information Report, dated May 16, 2022);

- Missed Call, LLC (Certificate of Formation, dated February 21, 2022);
- PacSec3, LLC (Texas Franchise Tax Public Information Report, dated May 16, 2022);
- ProudLion IP LLC (Certificate of Formation, dated March 10, 2022);
- Safe IP LLC (Texas Franchise Tax Public Information Report, dated May 15, 2023);
- Silent Communication, LLC (Texas Franchise Tax Public Information Report, dated May 16, 2022);
- SmartWatch MobileConcepts, LLC (Certificate of Formation, dated March 31, 2022);
- Sound Nexus LLC (Texas Franchise Tax Public Information Report, dated May 15, 2023);
- Street Spirit IP LLC (Certificate of Formation, dated May 25, 2022);
- WFR IP, LLC (Certificate of Formation, dated April 26, 2022);
- WirelessWerx IP, LLC (Certificate of Formation, dated May 27, 2022).

3. Attached as **Exhibit 3** is a true and correct copy of the Texas Franchise Tax Public Information Report for Linfo LP LLC, dated February 13, 2023.

4. Attached as **Exhibit 4** is a true and correct copy of a report generated from Lex Machina showing the list of pending litigation matters as of October 11, 2023, involving any of the Business Partners for which Mr. Ramey is counsel of record.

5. Attached as **Exhibit 5** is a true and correct copy of a report generated from Lex Machina showing cases where Mr. Ramey is listed as counsel of record that were filed between January 1 and October 5, 2023.

6. Attached as **Exhibit 6** is a true and correct copy of Docket No. 39-1 from *Street Spirit IP LLC v. eHarmony, Inc.*, Case No. 2:23-cv-02252-MCS-JPR (C.D. California).

7. Attached as **Exhibit 7** is a true and correct copy of an email chain between counsel for VMware and Mr. Ramey between August 11 and September 22, 2023.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: October 13, 2023

/s/ Richard S.J. Hung

Richard S.J. Hung, (Bar No. 43684)  
RHung@mofo.com  
425 Market Street  
San Francisco, CA 94105-2482  
Telephone: 415.268.7000  
Facsimile: 415.268.7522

Attorney for Defendant  
VMware, Inc.